



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

N00217.003233  
HUNTERS POINT  
SSIC NO.5090.3

March 29, 1996

Mr. David Song  
Department of the Navy  
Engineering Field Activity, West  
900 Commodore Drive, Code 18242  
San Bruno, CA 94066-5006

RE: Draft Updated Community Relation Plan for Hunters Point  
Annex, San Francisco, California

Dear Mr. Song:

EPA has reviewed the above referenced document prepared by PRC Environmental Management, Inc. and has provided comments under general, specific and glossary headings. The comments presented here involve fairly extensive revision to the document, and EPA anticipates that the draft final version of this Community Relations Plan will incorporate these revisions.

**General Comments:**

- (1) The overall size of the document is somewhat overwhelming for any casual reader. Much of the non-text information making up the bulk of the document is superfluous and could be judiciously removed. Leaving a few examples of recent newsletters developed by the Navy, and entirely removing the newspaper articles, would greatly reduce the thickness of this plan and make it more manageable.
- (2) The document would benefit from undergoing thorough technical and non-technical editing. It is essential that community plans be presented to community readers, who may be unfamiliar with the subject matter, in an understandable **and** technically sound manner. Neither of these two objectives have been consistently met within the text of this document.
- (3) We strongly recommend defining and explaining terms and acronyms wherever they first appear in the text, in addition to including a glossary section.

- (4) The objective of Table 3 (as stated in Section 4.3) is to identify the pertinent issues associated with each site within each parcel. The Table presents some useful information, but it is inappropriate to have the section "final recommendation" for any parcel with the exception of Parcel A. All other parcels are either undergoing work for the RI/FS process or are scheduled to go through the process over the next few years. Until the feasibility studies have been performed it is premature to decide what constitutes a "final recommendation". Please remove these sections from all parcels except Parcel A. See specific comment on Parcel A below.
- (5) Many very good general suggestions and plans are presented in Section 8.4 to reach out to the community and establish a means of communication. However, to ensure that these suggestions and plans get implemented, it is important that specifics such as schedules, locations, and designated Navy personnel responsible for the activities, be presented here too.

**Specific Comments:**

1. **Section 1.0, third paragraph:** Suggest replacing the first sentence with "This community relations plan replaces the 1989 plan and is prepared in accordance with the IR program requirements and complies with CERCLA."
2. **Section 1.0, last paragraph:** Suggest replacing "EPA functions as the lead regulatory agency" with "EPA provides regulatory oversight at HPA" so that there are not a confusing number of lead agencies to distinguish.
3. **Section 1.0, page 2, first paragraph:** Remove the sentence "The community relations activities at HPA meet the federal legal requirements". The previous sentence already states that the community relations work at HPA is completed under applicable federal law.
4. **Page 4:** EPA is under the impression that City of San Francisco has opened a new library recently. Please check whether this new library would be a convenient place to use as an information repository for this plan and other HPA documents.
5. **Section 3.2, page 7, last paragraph:** A site can be placed on the National Priorities List, and this is the **equivalent** of being designated a Superfund site. However, federal funds are set aside for cleanup of Superfund sites where the Potentially Responsible Parties (PRPs) have not been found and where there is an imminent and substantial endangerment to human health. Any federal facility listed on the NPL is

responsible for the cost of cleanup of the site and must pay for it out of its own appropriated budget. The Navy, therefore, is entirely responsible for the cost of cleanup of HPA, and Superfund funds cannot be accessed for this purpose.

6. **Section 3.2, page 8, last paragraph:** The Agency for Toxic Substances and Disease Registry is stated here to have designated HPA as a "B" site, yet the reference cited for this fact is a PRC/Harding Lawson document. Why not cite the actual ATSDR document, which depicts a more unbiased position than a Navy contractor's document?
7. **Section 4.1, page 10, second and third paragraph:** Provide a definition of "site assessment" and give a clearer description of the connection between "site assessment", "site inspection" and "installation restoration sites".
8. **Section 4.1, page 10, last sentence:** It is stated that contamination was found at 28 UST sites, but that only 25 will be cleaned up. Provide an explanation (i.e. contamination present at the three sites does not constitute any threat to public health or the environment) for no further action on the remaining three, so that the impression that possibly high levels of contamination are being left in place is dispelled.
9. **Section 4.1, page 11, second paragraph:** At Hunters Point Annex the feasibility studies are following the remedial investigations, and not being performed concurrently as stated.
10. **Section 4.2.1:** The proposed plan needs to be put in bold here, and a clause added stating that the proposed plan describes all alternatives and explains why the Navy recommends particular alternatives over others.
11. **Section 4.2.1:** Please change "record of recision" to "record of decision"! Also, the description in this section of the ROD for Parcel A is very misleading. This ROD does **not** document the selection for cleanup of soil and groundwater, but instead documents support for a decision of "no further action". Why would cleanup be needed when it has been concluded that no contaminants exist that may cause harm to people or the environment?
12. **Section 4.2.1:** Please change "... (RQWCB) agree with the conclusion ..." to "... (RQWCB) concur with the conclusion..."
13. **Section 4.2.6:** A description of suspected or known contaminants has been provided for Parcels A-E. Parcel F should likewise contain such a description to be consistent

with the other parcels, and if no data is yet available, that fact should be stated. Omitting a description of any contamination otherwise simply appears an oversight.

14. **Table 2, page 17:** HPA was placed on the NPL in 1989, not 1992. Also, delete the reference to the "invalid MOU" with the City of San Francisco. It is not a type of operation and is irrelevant for the purpose of this table.
15. **Page 18:** The map for Parcel A is missing.
16. **Table 3, page 22:** In the Table under Parcel A, Site IR-59, "final recommendation" section states "Further investigation through remedial investigation." The ROD for Parcel A concludes no further action and this encompasses IR-59. Please remove this recommendation and replace with "no further action: to be released to the City".
17. **Table 3, page 25:** Parcel C, IR-28, under the headings "suspected material used and/or disposed of at site" and "findings", states "see previous page". What exactly on the previous page is the reader supposed to see? Please clarify.
18. **Section 5.1:** The title of this section "Human Population Studies" sounds clinical and removed. Since this plan is going to be read by the people who are described in this section, a title such as "Bayview-Hunters Point Community Demographics" sounds more personal and more palatable. Likewise, reword the first sentence in this section to read "The community surrounding HPA..."
19. **Section 5.1:** Please remove the phrase "largest/smallest minority" when giving the breakdown of the community. The percentages are sufficiently self-explanatory.
20. **Section 5.2:** The presentation of the unemployment rate of the Bayview-Hunters Point community versus the census tract that makes up HPA is worded in such a way that it is misleading and potentially insulting to the community. It is well known that one of the most pressing concerns for the community is that jobs be made available for them at HPA. Thus, pointing out that the community has a high unemployment rate (a fact of which they are only too well aware) and that HPA has no unemployment serves no beneficial purpose. Please reword this paragraph to be less inflammatory and more sensitive to the concerns of the community.
21. **Section 6.3.1, first paragraph:** Please check to make sure that HPA's RAB representatives serve for a two-year term. Not all RAB by-laws carry the two-year limit, although HPA may.

22. **Section 7.0:** The referenced sections under this section need to be changed from "6" to "7".
23. **Section 7.1.2, last sentence:** Please reword this sentence to clarify. How can an interview include follow-up suggestions? Perhaps what is meant is that the interviewees were asked for suggestions which the Navy could later follow up?
24. **Section 7.2, page 41, first paragraph:** "Individual community members" are referenced here. No mention of these individuals is evident in the preceding section (section 7.1.2), except for the statement "a cross-section of individuals ... was interviewed". Please give an explanation of how these individuals were found and how it was determined that they constituted cross-sections of the community. Those listed appear to be only public officials, bossiness representatives, educators, or those affiliated with an organization. Are there any individual home owners or any individuals who are not members of an organization?
25. **Section 7.2, first paragraph:** Shoreview has also recently received an environmental justice grant from EPA and should be included in the listing of community-based environmental organizations.
26. **Section 7.4.1 and Section 7.4.2:** It is stated in this section that individuals are very concerned about potential lead contamination and about the quality of the community drinking water. In the interests of furthering community relations, it would be appropriate to describe in this plan a strategy for distributing information in the form of already developed brochures on the subject of minimizing lead exposure and the associated health risks. It would also be very useful to stress not only in the document, but in newsletters and at meetings, that the community receives drinking water from City of San Francisco which is supplied by Hetch-Hetchy Reservoir. No drinking water is supplied to the community from groundwater at Hunters Point Annex. This simple explanation could go a long way to alleviating the concerns repeatedly expressed by community members.
27. **Section 7.4.4:** These concerns appear to be more appropriately labeled "air pollution concerns" rather than general health concerns.
28. **Section 8.0, page 44:** Section 8.3 does not explain the RAB.
29. **Section 8.1:** Delete the last part of the third sentence so that it reads: "These community relations activities are consistent with EPA guidelines."

30. **Section 8.1.2:** Delete "Beginning of an" under the bullet "Beginning of an emergency response action"
31. **Section 8.1.2:** Clarify the statement "The public has 30 days in which to make comments". On what and how? Also, please clarify the sentence "Where appropriate and feasible, the Navy will consider also posting the notices in the locations of the proposed removal or remedial actions". Where are these locations? On the soil? Outside the nearest building?
32. **Section 8.1.4:** Delete the first sentence in this section which sounds condescending and serves no purpose. Start with the second sentence which is a positive, proactive opener for the section.
33. **Section 8.1.4:** Please make sure that individuals who request to be added to the Navy's mailing list are still protected from having their names and addresses made public.
34. **Section 8.1.5, first sentence:** Reword to read "An administrative record contains the documents that the Navy used to decide which cleanup remedy should be selected."
35. **Section 8.2:** Since the RAB is proposed as the primary means of supporting the Navy's overall outreach effort, this section needs to be expanded and elaborated on. Section 7.3 does not describe the RAB. Section 6.3 does give details concerning the establishment of the RAB and the responsibilities of RAB members, but does not give explicit plans for how the RAB will communicate and assume outreach responsibilities for the community.
36. **Section 8.4.1, page 51, first paragraph:** Many members are reported to have expressed interest in additional open houses and site tours of HPA. This CRP provides an ideal opportunity to commit to such events and to develop some schedules so that the Navy's commitment to community concerns is readily apparent.
37. **Section 9.0, second sentence:** Replace sentence with "During these activities, the Navy evaluates the community relations activities in terms of community concerns and technical milestones".
38. **Section 9.0, fifth sentence:** Replace "citizens" with the more general term "residents" and insert "interested parties" after the word "other".
39. **Page A-1, first sentence:** The reference to the glossary is unnecessary; add the words "clean up" before hazardous waste sites.

40. **Page A-2, last full paragraph:** The documents are available for the general public for review and comment and are not exclusively prepared for the regulatory agencies and the RAB.
41. **Page A-3:** Reword the text on this page to take into account that comments received are evaluated and responded to and that subsequently the ROD is signed. Delete the sentence "The ROD is followed by design of cleanup and by conducting the final cleanup". In the following sentence the "cleanup plan design" is again referenced, which is not accepted CERCLA terminology. Please correctly use "remedial design" and "remedial action".
42. **Page B-1:** Since these entities are public and regulatory agencies, it would be appropriate and helpful to give addresses and the name of a contact with each agency.
43. **Page D-4:** This page should be removed, as it gives no information that couldn't easily be inserted into the text.
44. **Page H-1:** Marie Franklin's suggestion of E.P. Mills Community Center should be added as a third location for public meetings.

#### **Glossary:**

**Please replace the glossary definitions with those listed below which are based on the definitions in the Hunters Point BRAC Cleanup Plan (except for groundwater for which an alternative definition is suggested):**

Cleanup: Actions taken to deal with a release or threatened release of hazardous substances that could affect public health or the environment.

Hazard Ranking System: A scoring system used by EPA to evaluate risks to public health and the environment associated with abandoned or uncontrolled hazardous waste sites. The score is calculated based on the potential of hazardous substances spreading from the site through the air, surface water, or groundwater and on other factors such as nearby population.

Information Repository: A public place, for example the Anna E. Waden Library, where information, such as files, technical reports and other HPA cleanup documents, is kept available for the public to read.

Groundwater: Underground water that fills the spaces between sand, soil and gravel particles, or openings in rocks to the point of saturation.

National Priorities List: EPA's list of the most serious uncontrolled or abandoned hazardous waste sites identified for possible long-term remedial response. The list is based primarily on the score a site receives on the hazard ranking system (see definition). Hunters Point was placed on the NPL in 1989.

Record of Decision: A public document that explains which cleanup method will be used at a National Priorities List site. The ROD is based on information and technical analysis that results from the remedial investigation and feasibility study and takes into consideration public comments and concerns.

Site Inspection: The step that follows the preliminary assessment where further action is recommended for a site. Site investigations include the collection of samples to help determine the extent of a problem.

Superfund: The program operated under the legislative authority of CERCLA that funds and carries out the EPA solid waste emergency and long-term removal remedial activities (remedies). These activities include establishing the National Priorities List (NPL), investigating sites for inclusion on the list, determining their priority level on the list, and conducting or supervising the cleanup and other remedial actions. **Note: the definition currently supplied in the CRP glossary is incorrect and particularly misleading for a federal facilities NPL site where the funding for cleanup cannot come from the Superfund program.**

If you have any questions or comments, please call me at (415) 744-2389 or call Dorothy Wilson, EPA's Community Relations Specialist, at (415) 744-2179.

Sincerely,

*Anna Marie Cook*

Anna-Marie Cook  
Remedial Project Manager

cc: Dorothy Wilson, EPA  
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